

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF POSTAL SERVICE WITNESS SCHERER
TO UPS INTERROGATORIES
(UPS/USPS-T30-1, 3)

The United States Postal Service hereby provides the response of Postal Service witness Scherer to the following interrogatories of United Parcel Service: UPS/USPS-T30-1, 3, filed on November 1, 2001. The response to interrogatory 2 has been delayed and will be filed shortly.

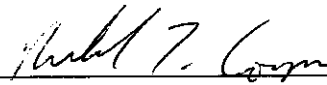
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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November 15, 2001

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES
REDIRECTED FROM WITNESS SCHERER

UPS/USPS-T30-1. Are there ZIP Code pair delivery standards for Priority Mail for each ZIP Code to which Priority Mail is delivered? If not, for what portion of ZIP Code pairs are there delivery standards?

RESPONSE:

Yes, there are Priority Mail service (delivery) standards for all 849,106 valid three-digit ZIP Code pairs.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
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REDIRECTED FROM WITNESS SCHERER

UPS/USPS-T30-3. Are the delivery standards for Priority Mail different under the FedEx transportation contract? If so, provide the proportion of the changed pairs to the total number of all Priority Mail ZIP Code pairs for which delivery standards have been or will be upgraded (providing for a shorter delivery time) and for which delivery standards have been or will be downgraded (providing for a longer delivery time).

RESPONSE:

No changes to Priority Mail service (delivery) standards have been made as a result of the FedEx transportation contract.

DECLARATION

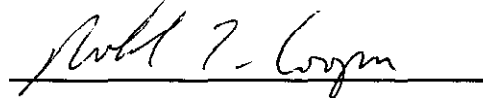
I, Thomas M. Scherer, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Thomas M. Scherer
THOMAS M. SCHERER

Dated: 11-15-01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

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